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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

SEP 17 2012

John Lebeaux, Town Administrator
Town Hall
Town of Princeton
6 Town Hall Drive
Princeton, Massachusetts 01541

Re: Modification to PCB Risk-Based Disposal Plan under 40 CFR § 761.61(c),
§ 761.62(c) and § 761.79(h)
Thomas Prince School
Princeton, Massachusetts

Dear Mr. Lebeaux:

This is in response to the August 14, 2012 Town of Princeton, Massachusetts (the Town) request to modify its PCB cleanup and disposal plan for the Thomas Prince School located in Princeton, Massachusetts. The modification was submitted in accordance with Condition 22 of the *February 21, 2012 Approval for PCB Risk-Based Disposal Plan under 40 CFR § 761.61(c), § 761.62(c) and § 761.79(h)* (the Approval). Additional information was provided dated September 2, 2012; September 4, 2012; September 6, 2012; and September 10, 2012.

In its modification request, the Town has proposed the following PCB abatement activities:

- Remove PCB caulk associated with windows in the 100-wing classrooms and dispose of in a TSCA-approved disposal facility or RCRA hazardous waste landfill;
- Remove PCB caulk around exterior air vent intakes for the 100-wing classrooms and dispose of in a TSCA-approved disposal facility or RCRA hazardous waste landfill;
- Remove PCB caulk located in exterior vertical structural joints associated with the pre-cast concrete columns for classrooms 100, 102, 108, 110, 201, 203, 205, 207, and 211 and dispose of in a TSCA-approved disposal facility or RCRA hazardous waste landfill;
- Decontaminate *non-porous surfaces* (i.e., 100-wing window frames) to achieve a PCB cleanup standard of less than or equal to (\leq) 1 $\mu\text{g}/100 \text{ cm}^2$;

- Decontaminate *non-porous surfaces* (i.e., 200-wing air intake louvered vent covers) to achieve a PCB cleanup standard of $\leq 1 \mu\text{g}/100 \text{ cm}^2$, or remove and dispose of as a PCB waste;
- Encapsulate exterior PCB-contaminated *porous surfaces* (i.e., brick, mortar and pre-cast concrete) with two coats of an epoxy coating;
- Encapsulate interior PCB-contaminated *porous surfaces* (i.e., concrete masonry) with two coats of an epoxy coating; and,
- Remove/replace identified or potential PCB capacitors in the unit ventilators in classrooms 100, 102, 104, 106, 108, and 110.

Based on the EPA's review, the information provided in the modification meets the requirements under § 761.62(a) and § 761.79(h) for abatement and disposal of PCB caulk, under § 761.61(a) for decontamination of *non-porous surfaces*, and under § 761.61(c) for encapsulation of *porous surfaces*. The proposed modification is consistent with the encapsulation work previously authorized under the Approval. EPA finds that the proposed encapsulation of PCB-contaminated *porous surfaces* should effectively prevent direct exposure of these PCB-contaminated *porous surfaces* to building users provided the encapsulated surfaces are maintained. As such, EPA is approving your modification request with the following conditions:

1. Unless otherwise modified by this letter, the Town must comply with all terms and conditions specified in its February 21, 2012 Approval.
2. Following the encapsulation of PCB-contaminated *porous surfaces*, post-encapsulation sampling shall be conducted to determine the effectiveness of the encapsulation.
 - a. Surface wipe samples shall be collected from encapsulated surfaces. Wipe sampling shall be performed on a surface area basis by the standard wipe test as specified in 40 CFR § 761.123 (i.e., $\mu\text{g}/100 \text{ cm}^2$).
 - b. Chemical extraction for PCBs shall be conducted using Method 3500B/3540C of SW-846; and, chemical analysis for PCBs shall be conducted using Method 8082 of SW-846, unless another extraction or analytical method(s) is validated according to Subpart Q.
 - c. In the event that the PCB concentration in **any** surface wipe sample is greater than ($>$) $1 \mu\text{g}/100 \text{ cm}^2$ and this standard cannot be achieved by application of additional coatings or encapsulants, the Town shall contact EPA for further discussion and direction on alternatives.

3. Initial post-abatement indoor air sampling and indoor surface wipe sampling for PCBs shall be conducted to determine the impact of the abatement activities as described in the modification.
 - a. Initial post-abatement sampling
 - i) Indoor air sampling shall be conducted in accordance with EPA Method TO-4A or TO-10A. Sufficient sample volumes shall be collected to provide a minimum laboratory reporting limit of less than ($<$) $0.05 \mu\text{g}/\text{m}^3$. At a minimum, PCB analysis shall include PCB homologues and/or PCB congeners.
 - ii) Wipe sampling of indoor surfaces shall be performed on a surface area basis by the standard wipe test as specified in 40 CFR § 761.123 (i.e. $\mu\text{g}/100 \text{ cm}^2$). Chemical extraction for PCBs shall be conducted using Method 3500B/3540C of SW-846 and chemical analysis for PCBs shall be conducted using Method 8082 of SW-846, unless another method(s) is validated according to Subpart Q.
 - b. In the event that PCB concentrations in the wipe samples are $> 1 \mu\text{g}/100 \text{ cm}^2$ or air sample results are $> 0.10 \mu\text{g}/\text{m}^3$, the Town shall contact EPA for further discussion and direction on alternatives, which may include additional indoor cleaning and/or development of a site-specific risk exposure assessment to support a higher indoor air PCB concentration.
 - c. Within sixty (60) days of completion of the work authorized under the February 21, 2012 Approval and this modification, the Town shall submit for EPA's review and approval, a detailed monitoring and maintenance implementation plan (MMIP) for the encapsulated surfaces and for indoor air. The Town shall incorporate any changes to the MMIP required by EPA (see Condition 20 of the February 21, 2012 Approval).
4. The Town shall continue to conduct outreach to schools users on the PCB contamination and the remediation efforts at the Site. Documentation of the outreach effort must be included in the final completion report required under Condition 27 of the February 21, 2012 Approval.
5. The Town shall record a notice on the deed to document that PCBs with $> 1 \text{ ppm}$ remain at the Site. Within thirty (30) days of completing the activities described in the Notification and the modification, and authorized in the February 21, 2012 Approval and this modification approval, the Town shall submit for EPA review and approval, a draft deed notice for the Site. The deed notice shall include: a description of the extent and levels of contamination at the Site following abatement; a description of the actions taken at the Site; a description of the use restrictions for the Site, if applicable; and the long-term monitoring and maintenance requirements on the Site, which may be addressed in

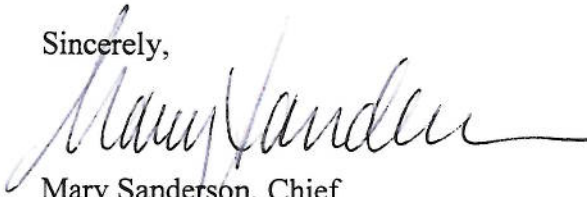
the MMIP (see Condition 3.c). Within seven (7) days of receipt of EPA's approval of the draft deed notice, the Town shall record the deed notice and shall attach a copy of the February 21, 2012 Approval and this modification approval to the deed notice.

6. The abatement activities approved by this letter, and a copy of the recorded deed notice shall be included in the final completion report required under Condition 27 of the February 21, 2012 Approval.

Under the February 21, 2012 Approval and this modification approval, EPA is reserving its right to require additional mitigation measures should the results of the initial or long-term sampling indicate that an unreasonable risk to building users is present at the Site.

Should you have any questions regarding this matter, please contact Kimberly Tisa at (617) 918-1527.

Sincerely,

A handwritten signature in cursive script, appearing to read "Mary Sanderson", written in dark ink.

Mary Sanderson, Chief
Remediation and Restoration II Branch

cc: C. Klingler, ECS
Dr. M. Hirsh, Acting Commissioner DPH
MassDEP, Central Region
✓ File